

*United States Attorney
Southern District of New York*

December 2, 2020

BY ECF

The Honorable Alison J. Nathan
United States District Court
Southern District of New York
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Ghislaine Maxwell*, 20 Cr. 330 (AJN)

Dear Judge Nathan:

The Government respectfully submits this letter in response to the defense requests for sealing and for an *in camera* hearing in connection with the defendant's anticipated renewed application for bail. The Government has reviewed the proposed redactions to the defense letters dated November 25, 2020 and November 30, 2020. Because those proposed redactions are narrowly tailored to protect the privacy interests of third parties, the Government has no objection to the defense's proposed redactions. The Government objects, however, to the defense request for a sealed *in camera* hearing to discuss further sealing requests from the defense. As demonstrated by the defense's recent letters, any request for sealing of third party information can be made in writing with narrowly tailored redactions. Based on defense counsel's proffers regarding the potential harms that may come from publicly identifying proposed cosigners, the Government has no objection to the redaction and sealed filing of any identifying information for those individuals. Given the availability of redacted filings, the Government sees no reason for an entire hearing to be conducted without the opportunity for the public or the victims in this case to observe. Indeed, given that crime victims have a statutory right to be present and heard at any proceeding regarding the defendant's "release," 18 U.S.C. § 3771(a)(4), the Government would object to any proceeding addressing aspects of a renewed bail application that was conducted entirely *in camera*.

Respectfully submitted,

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Cc: All Counsel of Record (By ECF)